

Message

---

**From:** Kenny, Daniel [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1BE9BB592F144269BCD41DD3A6D8A6D4-DANIEL C. KENNY]  
**Sent:** 10/26/2020 11:49:20 PM  
**To:** Dixon Monty USGR [monty.dixon@syngenta.com]; Meadows, Sarah [Meadows.Sarah@epa.gov]; Schmid, Emily [Schmid.Emily@epa.gov]  
**CC:** Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Crawford, Lydia [Crawford.Lydia@epa.gov]  
**Subject:** RE: Tavium Label

Thank you Monty. I did a quick scan, and there are a couple things I saw. We'll need to have the team to a final sweep to make sure nothing from before was inadvertently changes, but in the meantime we can/should do just a couple things:

- 1) Sarah had mentioned a late breaking addition to the buffer exclusions if you were interested, and it just came through. If you'd like, you can expand the first exclusion to the buffer area that currently discusses mowed grass fields to read "...mowed grass areas, and areas of bare ground from recent plowing or grading that are contiguous to the treated field."
- 2) We need to change the heading from that section from "Sensitive Areas". That has been causing huge confusion on whether they need to always observe the buffer or only if it's considered a sensitive area. Please change the heading to read something like "Spray Buffers", or something like that. That would improve the issue quite a bit.

Thanks very much,  
Dan

---

**From:** Dixon Monty USGR <monty.dixon@syngenta.com>  
**Sent:** Monday, October 26, 2020 7:32 PM  
**To:** Meadows, Sarah <Meadows.Sarah@epa.gov>; Schmid, Emily <Schmid.Emily@epa.gov>  
**Cc:** Kenny, Daniel <Kenny.Dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Crawford, Lydia <Crawford.Lydia@epa.gov>  
**Subject:** RE: Tavium Label  
**Importance:** High

Hello Sarah,

Please find the revised label for Tavium (000100-01623.20200812.A21472\_PLUS\_VAPORGRIP\_TECHNOLOGY.AMEND.AUG2020-CL.pdf). The only change from the earlier version was the rewording of section 4.7 (page 16) as discussed below. Please let me know if any further changes are needed, I will be available at anytime.

With Kind Regards,

Monty

---

**From:** Meadows, Sarah <Meadows.Sarah@epa.gov>  
**Sent:** Monday, October 26, 2020 7:11 PM  
**To:** Dixon Monty USGR <monty.dixon@syngenta.com>; Schmid, Emily <Schmid.Emily@epa.gov>  
**Cc:** Kenny, Daniel <Kenny.Dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Crawford, Lydia <Crawford.Lydia@epa.gov>  
**Subject:** RE: Tavium Label

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

That's right. Thanks, Monty.

---

**From:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>

**Sent:** Monday, October 26, 2020 7:05 PM

**To:** Meadows, Sarah <[Meadows.Sarah@epa.gov](mailto:Meadows.Sarah@epa.gov)>; Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>

**Cc:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Crawford, Lydia <[Crawford.Lydia@epa.gov](mailto:Crawford.Lydia@epa.gov)>

**Subject:** RE: Tavium Label

Hi Sarah,

I realize our emails of 6:54 crossed paths. For clarity and based upon the note below, and the attached email...we are going to add back the language that is aligned/the same as Bayer's label. Please let me know if that is not correct.

Thanks  
Monty

---

**From:** Meadows, Sarah <[Meadows.Sarah@epa.gov](mailto:Meadows.Sarah@epa.gov)>

**Sent:** Monday, October 26, 2020 6:54 PM

**To:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>; Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>

**Cc:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Crawford, Lydia <[Crawford.Lydia@epa.gov](mailto:Crawford.Lydia@epa.gov)>

**Subject:** RE: Tavium Label

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

---

Hi, Monty. Yes, you can include that language. Sorry for the confusion.

Thanks,  
  
Sarah

---

**From:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>

**Sent:** Monday, October 26, 2020 6:24 PM

**To:** Meadows, Sarah <[Meadows.Sarah@epa.gov](mailto:Meadows.Sarah@epa.gov)>; Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>

**Cc:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Crawford, Lydia <[Crawford.Lydia@epa.gov](mailto:Crawford.Lydia@epa.gov)>

**Subject:** RE: Tavium Label

Hi Sarah,

Thanks. One last question to hopefully ensure consistency, Bayer shared their label with us which has the following:

ED\_005172A\_00001315-00002

ED\_005172C\_00000169-00002

We were instructed to remove this in our label comments received Friday (see below)

May we include the struck language back?

Thanks  
Monty

---

**From:** Meadows, Sarah <[Meadows.Sarah@epa.gov](mailto:Meadows.Sarah@epa.gov)>  
**Sent:** Monday, October 26, 2020 6:10 PM  
**To:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>; Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Cc:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Crawford, Lydia <[Crawford.Lydia@epa.gov](mailto:Crawford.Lydia@epa.gov)>  
**Subject:** RE: Tavium Label

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi, Monty. You can go ahead and send me the new version now just in case we don't need another change. And there's no need for a highlighted copy, just a clean copy.

Thanks,

Sarah

---

**From:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>  
**Sent:** Monday, October 26, 2020 6:08 PM  
**To:** Meadows, Sarah <[Meadows.Sarah@epa.gov](mailto:Meadows.Sarah@epa.gov)>; Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Cc:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Crawford, Lydia <[Crawford.Lydia@epa.gov](mailto:Crawford.Lydia@epa.gov)>  
**Subject:** RE: Tavium Label

Hi Sarah,

I will have that put back and we can send it back in the event there the other change ends up not being required unless you prefer me to wait for the final label change.

Also, for ease of these final reviews, would you prefer I only include version highlighting these last changes or is it better to include the version with all changes in the earlier iterations highlighted..

Thanks  
Monty

---

**From:** Meadows, Sarah <[Meadows.Sarah@epa.gov](mailto:Meadows.Sarah@epa.gov)>  
**Sent:** Monday, October 26, 2020 5:37 PM  
**To:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>; Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Cc:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Crawford, Lydia <[Crawford.Lydia@epa.gov](mailto:Crawford.Lydia@epa.gov)>  
**Subject:** RE: Tavium Label

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

---

Hi, Monty. I noticed one statement has been removed that we'll need you to add back. I have noted it in the attached file. There may be one other label change needed tonight, but I wanted to go ahead and give you the heads up on this.

Thanks,

Sarah

---

**From:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>  
**Sent:** Monday, October 26, 2020 5:02 PM  
**To:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Cc:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Meadows, Sarah <[Meadows.Sarah@epa.gov](mailto:Meadows.Sarah@epa.gov)>; Crawford, Lydia <[Crawford.Lydia@epa.gov](mailto:Crawford.Lydia@epa.gov)>  
**Subject:** RE: Tavium Label

Hi Emily,

Thanks and again apologies for sending multiple version so quickly. I am available at anytime the rest of the day/evening if needed.

Best Regards,  
Monty

---

**From:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Sent:** Monday, October 26, 2020 4:34 PM  
**To:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>  
**Cc:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Meadows, Sarah <[Meadows.Sarah@epa.gov](mailto:Meadows.Sarah@epa.gov)>; Crawford, Lydia <[Crawford.Lydia@epa.gov](mailto:Crawford.Lydia@epa.gov)>  
**Subject:** RE: Tavium Label

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

---

Hi Monty,

Sarah is helping me check the label so I forwarded this latest version to her.

Thank you,  
Emily

---

**From:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>  
**Sent:** Monday, October 26, 2020 4:21 PM  
**To:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>; Crawford, Lydia <[Crawford.Lydia@epa.gov](mailto:Crawford.Lydia@epa.gov)>  
**Cc:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>  
**Subject:** RE: Tavium Label  
**Importance:** High

Hi Emily,

I was just alerted to one change that will be needed for a smoc maximum rate in the cotton sections. Specifically, section 8.1.1 section 3.b. should read as follows:

- DO NO exceed ~~3.71~~ 2.48 lb ai/A/year of S-metolachlor-containing products on medium- or fine -textured soils.

This is the only needed change.

I am very sorry for this needed correction and hope this does not create too much inconvenience.

Thanks  
Monty

---

**From:** Dixon Monty USGR  
**Sent:** Monday, October 26, 2020 4:03 PM  
**To:** 'Schmid, Emily' <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>; 'Crawford, Lydia' <[Crawford.Lydia@epa.gov](mailto:Crawford.Lydia@epa.gov)>  
**Cc:** [kenny.dan@epa.gov](mailto:kenny.dan@epa.gov) <[kenny.dan@epa.gov](mailto:kenny.dan@epa.gov)>; 'Echeverria, Marietta' <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>  
**Subject:** RE: Tavium Label

Hello Emily,

My label team just provided this version that highlights all changes made today including adding the typographical edits as well as those mentioned below. This version may be easier for your review. Please therefore find the clean and this version with only today's edits added.

Thanks  
Monty

**From:** Dixon Monty USGR

**Sent:** Monday, October 26, 2020 3:56 PM

**To:** Schmid, Emily <Schmid.Emily@epa.gov>; Crawford, Lydia <Crawford.Lydia@epa.gov>

**Cc:** kenny.dan@epa.gov <kenny.dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>

**Subject:** RE: Tavium Label

Hi Emily,

Please find attached the revised labels. As requested, we have added page numbers and made the following changes:

Section (Page)	Previous Version	New Version
4.7 (16)	Applications of this product may qualify for reduced use restrictions, such as a reduced downwind buffer distance, provided a <b>qualified DRT</b> listed on <a href="http://www.TaviumTankMix.com">www.TaviumTankMix.com</a> is used and operated according to the directions and limitations provided at <a href="http://www.TaviumTankMix.com">www.TaviumTankMix.com</a> .	<i>Deleted based upon guidance below</i>
4.7.1 (16)	<i>Requirements for Reduced Use Restrictions with Optional Hooded/Shielded Sprayer:</i> <b>ONLY qualified</b> hooded/shielded sprayers listed on <a href="http://www.TaviumTankMix.com">www.TaviumTankMix.com</a> . are eligible for reduced use restrictions when applying this product. Refer to the website for specific application requirements when using a <b>qualified</b> hooded/shielded sprayer. While this product may be applied with other (non-qualified) hooded/shielded sprayers, no reduction in use restrictions is associated with their use.	<i>Requirements for Reduced Use Restrictions with Optional Hooded/Shielded Sprayer:</i> <b>ONLY qualified</b> hooded/shielded sprayers listed on <a href="http://www.TaviumTankMix.com">www.TaviumTankMix.com</a> are eligible for reduced use restrictions when applying this product. If a <b>qualified</b> hooded/shielded sprayer is used for applications to dicamba-tolerant soybeans, the downwind buffer is 110 feet. While this product may be applied with other (non-qualified) hooded/shielded sprayers, no reduction in use restrictions is associated with their use.
6.3.7 (23)	Roads, paved or gravel surfaces, mowed and/or managed areas adjacent to fields such as rights-of-ways.	Roads, paved or gravel surfaces, mowed grass areas adjacent to treated fields.

In addition, we corrected a couple of typos and removed the – from 240-foot to read 240 foot.

I have included a clean, highlighted (blue new edits) that includes all previous changes and then a single edit that shows the points in the chart above. Note the deletion in section 4.7 page 16 is not shown in the single edit but is in the highlighted version with all edits.

Please let me know if can do anything else on my end.

Thanks  
Monty

---

**From:** Dixon Monty USGR  
**Sent:** Monday, October 26, 2020 3:16 PM  
**To:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Subject:** RE: Tavium Label

Hi Emily,

Just an update, hope to have label to you in next 15 to 20 minutes.

Thanks  
Monty

---

**From:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Sent:** Monday, October 26, 2020 1:45 PM  
**To:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>  
**Subject:** RE: Tavium Label

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

---

Hi Monty,

Yes, I believe this is what he was talking about.

Add to "4.7 Optional Use of Drift Reduction Technology" (Page 15):  
If approved hooded sprayer is used, the downwind buffer is 110'.

Let me know if I'm misunderstanding and you are looking for something else.

Thanks,  
Emily

---

**From:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>  
**Sent:** Monday, October 26, 2020 1:39 PM  
**To:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Subject:** RE: Tavium Label

Hi Emily,

Yes, happy to do so. He had mentioned you were working on hooded sprayer language that we could incorporate. Do you have that by chance...if so we can add it to this version.

Thanks  
Monty

---

**From:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Sent:** Monday, October 26, 2020 1:37 PM  
**To:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>  
**Subject:** Tavium Label

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

---

Hi Monty,

Dan let me know that you were working on last edits to the label. I noticed it doesn't have page numbers. Could you add those? It will fail QAQC without them and I don't want to risk that.

You can go ahead and send the revised label to me as soon as you have it ready.

Thanks!  
Emily

Emily Schmid  
Product Manager 25  
Herbicide Branch  
Registration Division, Office of Pesticide Programs  
U.S. Environmental Protection Agency

---

*This message may contain confidential information. If you are not the designated recipient, please notify the sender immediately, and delete the original and any copies. Any use of the message by you is prohibited. Syngenta seeks to preserve and promote competition and deter anticompetitive conduct. All our employees and partners are required to act in accordance with laws and Syngenta "Code of Conduct"*